



Town of Palmer

WATER POLLUTION CONTROL FACILITIES

1 NORBELL STREET, THREE RIVERS, MA. 01080

Tel. (413) 283-2671
Fax. (413) 284-1796

April 13, 2021

Dan Kurpaska
Massachusetts DEP
436 Dwight Street
Suite 402
SPFLD, MA 01103

Re: Industrial Pretreatment
Program Annual Report
Palmer, MA

Dear Mr. Kurpaska:

On behalf of the Town of Palmer, I am submitting the Industrial Pretreatment Program Annual Report. This report summarizes the Town's Industrial Pretreatment activities during the 2020 report period.

Sincerely,

Scott Williams
IPP Coordinator

cc: Gerald Skowronek Supt. PWPCF
Mr. Justin Pimpore EPA Boston MA
Sanh Tran MA DEP Director Wastewater Management Program Boston MA



Town of Palmer

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US EPA- New England
Attn: Justin Pimpare
5 Post Office Square
Suite 100 OEP 06-03
Boston, MA 02109-3912

April 13, 2021

Re: Industrial Pretreatment
Program Annual Report
Palmer, MA

Dear Mr. Pimpare:

On behalf of the Town of Palmer, I am submitting the Industrial Pretreatment Program Annual Report. This report summarizes the Town's Industrial Pretreatment activities during the 2020 report period.

Sincerely,

Scott Williams
IPP Coordinator

cc: Gerald Skowronek Supt. PWPCF
Dan Kurpaska, MA DEP Spfld MA
Sanh Tran MA DEP Director Wastewater Management Program Boston MA



Town of Palmer

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Massachusetts DEP
Director Sanh Tran
Wastewater Management Program
One Winter Street 5th Floor
Boston, Ma 02108

April 13, 2021

Re: Industrial Pretreatment
Program Annual Report
Palmer, MA

Dear Director Tran:

On behalf of the Town of Palmer, I am submitting the Industrial Pretreatment Program Annual Report. This report summarizes the Town's Industrial Pretreatment activities during the 2020 report period.

Sincerely,

Scott Williams
IPP Coordinator

cc: Gerald Skowronek Supt. PWPCF
Mr. Justin Pimpare EPA Boston MA
Dan Kurpaska MA DEP Spfld. MA

TOWN OF PALMER

INDUSTRIAL PRETREATMENT PROGRAM

ANNUAL REPORT

2020

EPA Region 1 Annual Pretreatment Report Summary Sheet 2019

POTW Name:	Palmer WWTP
NPDES Permit #:	MA0101168
Pretreatment Report Period Start Date:	4-1-2020
Pretreatment Report Period End Date:	3-31-2021
# of Significant Industrial Users (SIUs):	2
# of SIUs Without Control Mechanisms:	0
# of SIUs not Inspected:	0
# of SIUs not Sampled:	0
# of SIUs in Significant Noncompliance (SNC) with Pretreatment Standards:	0
# of SIUs in SNC with Reporting Requirements:	0
# of SIUs in SNC with Pretreatment Compliance Schedule:	0
# of SIUs in SNC Published in Newspaper:	0
# of SIUs with Compliance Schedules:	2
# of Violation Notices Issued to SIUs:	0
# of Administrative Orders Issued to SIUs:	0
# of Civil Suits Filed Against SIUs:	0
# of Criminal Suits Filed Against SIUs:	0
# of Categorical Industrial Users (CIUs):	2
# of CIUs in SNC:	0

Penalties

Total Dollar Amount of Penalties Collected

\$ 0

of IUs from which Penalties have been collected:

0

Local Limits

Date of Most Recent Technical Evaluation of Local Limits:

1/20/2001

Date of Most Recent Adoption of Technically Based Local Limits:

2/24/1998

Pollutant

Limit (mg/l)

MAHL (lb/day)

Copy Enclosed

TABLE 4

INDUSTRIAL PRETREATMENT PROGRAM
1997-2000 INFLUENT DATA and HEADWORKS LOADING EVALUATION

WATER POLLUTION CONTROL FACILITY
PALMER, MASSACHUSETTS

Parameters	Influent mg/L					Maximum 1997-2000 Local Limits Report	Influent Pounds/Day		Maximum Allowable Headworks Load 1996 Local Limits Report Pounds/Day
	2/23/2000	2/23/1999	2/26/1998	2/26/1997	Maximum 1997-2000		Maximum 1997-2000 (1)	Maximum 1996 Local Limits Report (2)	
Antimony									
Arsenic	<0.01	<0.005	<0.0005	<0.01	<0.01		0.101	0.059	5.138
Beryllium								0.059	1.096
Cadmium	<0.001	<0.001	<0.001	<0.001	<0.001		0.010	0.593	6.602
								0.012	0.329
Chromium	<0.01	<0.005	0.028	0.54 *	0.028				
Copper	0.054	0.077	0.064	0.17	0.17		0.565	3.559	6.921
Lead	<0.01	<0.01	<0.01	0.019	0.019		3.431	5.457	8.219
Mercury	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002		0.383	0.403	2.373
Nickel	<0.02	<0.01	0.025	0.31 *	0.025		0.002	0.016	0.018
							0.505	2.847	4.383
Selenium									
Silver	<0.01	<0.01	<0.01	<0.01	<0.01			0.059	6.851
Thallium							0.101	0.427	0.206
Zinc	0.065	0.057	<0.05	0.16	0.16		3.229	0.059	42.161
								3.796	8.187
Cyanide, total	<0.01	<0.01	<0.01	<0.01	<0.01		0.101	0.475	2.373

(1) Based on average flow of 2.42 mgd from February 1997 through March 2000

(2) Based on an average flow of 2.845 mgd in 1996 Local Limits Report

* Data excluded from calculation.

1. INTRODUCTION

This report is submitted annually by the Town of Palmer, Massachusetts to the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection, Division of Water Pollution Control in accordance with the requirements of section 4.b. (Annual Industrial Pretreatment Program Report) of the Town's NPDES Permit No. MA 0101168 and 40 CFR 402.12(I).

The implementation of the Town's Industrial Pretreatment Program (IPP) requirements is the responsibility of the Chief Operator and the IPP Coordinator at the Water Pollution Control Facility. Assistance has also been given, as needed, to the Palmer IPP by a consulting engineering firm (Tighe & Bond, Inc.) Contract Laboratory services are provided by Contest Laboratory East Longmeadow, MA.

Funding for the IPP is provided from the budget for the operation of the Water Pollution Control Facilities and charges made to the industries that participate in the program. There are currently three significant industrial users in the IPP. Current funding is sufficient to support expenses of the Superintendent/Chief Operator, part-time work of the IPP Coordinator and to retain consulting services to assist with certain aspects of the program.

TOWN OF PALMER SIGNIFICANT INDUSTRIAL USERS

The Palmer Industrial Pretreatment Program currently identifies two (2) industries in the program as Significant Industrial Users. These industries are required to possess discharge permits and conduct quarterly Industrial Self-Monitoring (ISM), and are to monitored and inspected annually by the WPCF.

Industrial Users (IU's) are identified as Significant Industrial Users (SIU's) if it has been determined that:

1. The IU is subject to Federal Categorical regulations.
2. The IU discharges an average of 25,000 gpd or more of process wastewater to the WPCF.
3. The IU discharges 5 percent or more of the treatment plants design load or flow.
4. The IU is capable of adversely affecting the WPCF's operation due to flow or pollutant contamination.
5. The IU is thought to have caused problems with the collection system.

This section provides the SIU summary, which includes regular self-monitoring results, IPP monitoring dates, and compliance status with applicable limits for 2020.

1.

Rathbone Precision Metals, Inc.

241 Park Street

Palmer, MA 01069

Contact: Brandon Robb

Manufacturer of cold drawn custom profile shapes in coil or bar shapes.

Raw Material: Carbon & Alloy Steel, Stainless, Copper & Brass

Permit No: MA 0101168-01

Applicable Federal Categorical Standards: 40 CFR 433 Metal Finishing, 40 CFR 468 Copper Forming

Wastewater Treatment Process: Hydroxide Precipitation (intermittent)

Domestic Waste: 500 gpd

Cooling Water (non-contact): 0 gpd

Process Water: 5,500 gpd

Air Pollution Control Unit: 900 gpd

Other: 0 gpd

Total: 4,900 gpd

Industrial Self Monitoring Reports Submitted:

April 2020, July 2020 October 2020

Total Toxic Organics Certification Statement Submitted:

April 2020, July 2020, October 2020

IPP inspected: January 26, 2021

IPP compliance monitoring: January 26, 2021.

Compliance Status: Rathbone is in compliance with Federal Categorical Standards, and has not caused any upsets at the Palmer WPCF.

**RATHBONE PRECISION METALS, INC.
INDUSTRIAL SELF MONITORING FOR 2020**

TABLE 1

Pollutant	Permit Limit mg/L	Monitoring Results (mg/L)							
		April-20		July-20		October-20		COMP	GRAB
		COMP	GRAB	COMP	GRAB	COMP	GRAB		
Cadmium	.69	No Sample		ND		ND			
Chromium	2.77	Do to covid		1.9		0.57			
Copper	3.38			0.04		0.025			
Lead	0.69			ND		ND			
Nickel	3.98			0.069		0.054			
Silver	0.43			ND		ND			
Zinc	2.61			0.021		0.011			
Cyanide total	1.10			ND		ND			
TTO	2.13								
F.O.G	33.7				ND		14		
	MIN-MAX	RANGE		RANGE		RANGE			
pH	5.5-9.5	5.5-8.1		6.1-8.2		5.5-8.2			

**TOTAL TOXIC ORGANIC CERTIFICATION STATEMENTS WERE SUBMITTED WITH EACH QUARTERLY REPORT.
*VIOLATION**

3. Profiles Inc.

7 First Street

Palmer, MA 01069

Contact: Frank Formeister

Manufacturer of drawn steel alloy metal rod for automotive and other industries.

Permit No.: MA 0101168-02

Raw Materials: Steel Alloy Rods

Applicable Federal Categorical Standards: 40 CFR 433 Metal Finishing,

Wastewater Treatment process: Hydroxide Precipitation (Batch)

Domestic waste: 1200 gpd

Process water: 4,000 gpd

Total: 5,200 GPD

Industrial Self-Monitoring Reports Submitted:

, July 2020, October 2020

Total Toxic Organic Certification Statement Submitted:

, July 2020, October 2020

IPP inspected: February 9th, 2021

IPP Compliance Monitoring: January 26, 2021

Compliance Status: The industry is in compliance with Federal Categorical Standards and with self-monitoring requirements and has not caused any upsets at the Palmer WPCF.

TABLE 2

**PROFILES, INC.
INDUSTRIAL SELF MONITORING FOR 2020**

Pollutant	Permit Limit mg/L	Monitoring Results (mg/L)					
		April-20		June-20		October-20	
		COMP	GRAB	COMP		COMP	GRAB
Cadmium	.69	NO sample		<0.005		<0.005	
Chromium	2.77	Do to covid		0.0815		<0.01	
Copper	3.38			.577		0.0946	
Lead	.69			<0.015		<0.015	
Nickel	3.98			0.0875		.0297	
Silver	.43			<0.001		<.0006	
Zinc	2.61			.456		.406	
Cyanide total	1.20			<0.01		.012	
TTO	2.13						
F.O.G	Monitor				<2.0		<2.11
	only						
	MIN-MAX	RANGE		RANGE		RANGE	
pH	5.5 – 8.5			7.2-7.9		7.1-7.9	

* VIOLATION

B. SIU's By Category, % Noncompliance with Applicable Requirements/Limits

Industrial User	Subject to Federal Category	ISM Submitted Noncompliance	Local Limit Noncompliance
Rathbone	40 CFR 433 40 CFR 468	0/2=0%	0/2=0%
Profiles	40 CFR 433	0/2=0%	0/2=0%

C. SIU Self Monitoring.

Results for the Industries ' Self Monitoring are summarized in T ables 1 through 3

3. COMPLIANCE AND ENFORCEMENT ACTIVITIES

A. Annual Inspections:

Annual Inspections of the three Significant Industrial Users Were performed by the Industrial Pretreatment Coordinator of the Palmer WPCF in January of 2016.

The dates of IPP Inspections were as Follows:

Rathbone – January 21, 2021

Profiles Inc. – February 9, 2021

Copies of the IPP annual inspection reports are included at the end of this section of the report.

B. IPP Compliance monitoring

Regular IPP compliance monitoring includes annual monitoring of pollutants of concern at each facility. A contract laboratory was hired to collect samples and perform analyses using EPA approved methods, for metals from Rathbone, Profiles.

The dates of 2020 IPP compliance Monitoring were as Follows:

Rathbone January 26 ,2021

Profiles January 26, 2021

The duration of sampling for the two industries are composites and grabs as appropriate. Table 4, presented at the end of section 2 summarizes the 2020 Compliance Monitoring results.

C. **Compliance Schedules Issued**

None were Required

D. **Notices of Deficiencies Issued**

None were issued

E. **Notices of Violations Issued**

A notice of Violation is issued for the occurrence of a discharge violation, or for failure to notify the WPCF of a discharge violation within 24 hours of becoming aware of it.

None were issued

F. Administrative Orders Issued

None were required

G. Criminal or Civil Suits filed

None were required

H. Penalties Obtained

None

I. List of Significantly Violating Industries to be Published.

No significantly violating industries will be published in the local newspaper for being in Significant Noncompliance during this reporting period.

***IPP COMPLIANCE INSPECTION REPORTS
FOR 2020***

**TOWN OF PALMER
INDUSTRIAL INSPECTION FORM AND CHECKLIST**

COMPANY NAME: Precision Engineered Products Group-Profiles

TYPE OF INDUSTRY: METALS,ROLLED,DRAWN,ANNEALED & PICKLED

PLANT CONTACT: MR. FRANK FORMEISTER

TITLE: CHIEF OPERATOR

DATE: February 9th 2021

POTW INSPECTOR: SCOTT WILLIAMS & STEVE WIPPERT

SIC CODE OR CODES 3351, 40 CFR 433 METAL FINISHING.

TIME OF ARRIVAL: 8:00 A.M.. **TIME OF DEPARTURE** 9:00 A.M.

NUMBER OF EMPLOYEES: 15

WORK SCHEDULE: MONDAY – FRIDAY 7:00 A.M – 7:00 AM.

PROCESS: COLD ROLLING AND DRAWING OF STEEL ALLOY ROD

RAW MATERIALS: STEEL ALLOY WIRE ROD.

PRE-TREATMENT: HYDROXIDE PRECIPITATION.

WASTEWATER GENERATED: 2,000 GPD

1) PRINCIPAL PRODUCT OR SERVICE OF FACILITY.

CLOSE TOLERANCE SHAPED METAL PARTS.

2) DESCRIPTION OF MANUFACTURING OR PRODUCTION PROCESS.

ON FILE AT POTW.

3] NUMBER AND NAMES OF INDIVIDUALS WITH IWW LICENSE AT THE FACILITY, & THAT ARE INVOLVED IN THE PRE-TREATMENT PROGRAM.

Frank Formeister 5C Shawn Morrison 2I John Richards 2I Mike Geralitas 2I

4] FLOW INF. MAX _____ EFF MAX. 2700 GPD

MIN _____ MIN 1500 GPD

5] ANY CHANGES IN PROCESS SINCE LAST INSPECTION?

Yes eliminated nitric acid bath

6] ANNUAL FLOW INTO SEWER SYSTEM?

450000 GALLONS PER YEAR.

7] WHERE ARE FLOW & WATER METERS LOCATED, & ARE THEY FUNCTIONING PROPERLY? FLOW METER IS LOCATED IN THE DISCHARGE LINE AT ABOUT 10 FEET PRIOR TO DISCHARGE INTO THE SEWER SYSTEM. THE METER IS CALIBRATED EVERY SIX MONTHS.

RECORDS PERMITS

1] CONTENTS OF PERMIT.

A] STATEMENT OF DURATION

B] STATEMENT OF NON-TRANSFERABILITY

C] EFFLUENT LOCAL LIMITS

Y i N _____
Y i N _____
Y i N _____

2] SELF MONITORING REQUIREMENTS

A] POLLUTANTS TO BE MONITORED

B] SAMPLING TIMES

C] SAMPLING LOCATION\ DISCHARGE POINTS

D] SAMPLE TYPE, GRAB OR COMPOSITE

E] REPORTING REQUIREMENTS TIMES ETC.

Y i N _____
Y i N _____
Y i N _____
Y i N _____
Y i N _____

3] COMPLIANCE SCHEDULES

A] NOTICE OF HEAVY LOADING TO WWTP

B] NOTIFICATION OF SPILL BYPASS ETC..

C] NOTIFICATION OF SIGNIFICANT CHANGE IN DISCHARGE

D] SLUG DISCHARGE CONTROL PLAN

Y i N _____
Y i N _____
Y i N _____
Y i N _____

4] PRE-TREATMENT STANDARDS

A] INDUSTRIAL USER CATEGORY 40 CFR 433.

B] CLASSIFICATION BY CATEGORY\ SUBCATEGORY. 433 METAL FINISHING

C] CLASSIFICATION AS A NEW OR EXISTING SOURCE - EXISTING.

D] APPLICATION OF LIMITS FOR ALL REGULATED POLLUTANTS

E] IMPLEMENTATION OF LOCAL LIMITS

F] APPLICATION OF MOST STRINGENT LIMIT

Y i N _____
Y i N _____
Y i N _____

5] COMPLIANCE MONITORING

1] SAMPLING

- A] ONCE PER YEAR
- B] DOCUMENTATION OF SAMPLING ACTIVITIES
- C] ANALYSES OF RESULTS FOR ALL PARAMETERS
- D] CORRECT ANALYTICAL METHODS

Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐

6] SELF MONITORING AND REPORTING

- A] SAMPLING AT FREQUENCY SPECIFIED
- B] ANALYZING ALL REQUIRED POLLUTANTS
- C] SUBMISSION OF 90 DAY BMR REPORT
- D] PERIODIC SELF MONITORING
- E] CERTIFICATION OF REPORTS
- F] COMPLIANCE SCHEDULES RECEIVED BY REQUIRED DATES
- G] NOTIFICATION TO WWTP ABOUT VIOLATIONS
- H] RESAMPLING WITHIN 30 DAYS OF NOV
- I] IMPLEMENTATION OF SLUG DISCHARGE CONTROL PLAN

Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐
Y ☒ N ☐

PRE-TREATMENT SYSTEMS

1] DESCRIBE ANY PRETREATMENT SYSTEMS AT THE FACILITY.

Hydroxide Precipitation. Process description on file at the Palmer WWTP.

2] ARE WASTE STREAMS COMBINED WITH DOMESTIC WASTE OR ARE THEY SEPARATE?

WASTE STREAMS ARE SEPARATE.

3] TYPE OF FLOW MEASUREMENT USED, & FREQUENCY OF CALIBRATION.

GF SIGNET, with an in line paddle sensor. Profiles has been notified to have the meter calibrated two times per year by an independent contractor.

4] MAINTENANCE SCHEDULE OF PRE-TREATMENT SYSTEM.

Maintenance to pretreatment system is done on a daily basis.

5] ARE ELECTRONIC LOGS KEPT FOR MAINTENANCE & CALIBRATION? Y ☒ N ☐

COOLING WATERS

1] SOURCES OF UNCONTAMINATED COOLING WATER.

None

2] ANY SOURCES OF RECIRCULATED COOLING WATER?

Yes there is a EDM machine (electric discharge machine). This water is recirculated.

3] DISPOSAL METHOD OF COOLING WATER

Cooling water from this system is run through a filter system and ion exchange resin tanks. Which eliminates discharge of cooling water.

4] IS COOLING WATER TREATED BEFORE RELEASE? {If yes what type of pre-treatment is used}

NA.

5] IS THERE ANY SLUDGE GENERATED, & HOW IS IT DISPOSED OF.

Yes sludge is generated from settling tanks and also from cleaning of the production rinse tanks when cleaned. The sludge is dewatered in a plate & frame filter press and is disposed of in a sanitary landfill. Approximately four tons per year. Annually they clean their process tanks and send out approximately 1500 pounds of hazardous waste sludge.

6] IS THE SLUDGE LISTED AS HAZARDOUS WASTE, & IS IT MANIFESTED.

The sludge generated from the rinse tanks and settling tanks is not listed as a hazardous waste according to Gary Page.

The sludge from the process tanks is considered hazardous waste and is manifested.

PRE-TREATMENT CON'T

SOLVENTS

1] DOES THE FACILITY USE ANY SOLVENTS OR DEGREASING AGENTS?

THEY USE SOLVENTS FOR MACHINE PARTS CLEANING.

2] ARE THERE ANY SOLVENT WASTES HANDLED SEPARATELY FROM OTHER CLEANING WASTE?

All solvent wastes are handled separately, put into separate containers and shipped out as a hazardous waste.

3] IS THERE ANY PRE-TREATMENT PRIOR TO DISCHARGE?

Y ☒ N ☐

4] HOW IS ANY RESIDUAL SLUDGE AT THE BOTTOM OF A TANK DISPOSED OF ?

The sludge is put through a plate and frame press and is disposed of in a landfill via Waste Management.

5] IS THERE A SOLVENT RECOVERY PLAN IN PLACE AT THE FACILITY? Y ☒ N ☐

6] IF SOLVENTS ARE USED HOW ARE THEY DISPOSED OF?

They are placed into separate drums and sent out as a hazardous waste.

BOILER BLOWDOWN

1] FREQUENCY AND VOLUME.

Blowdown goes directly to the treatment plant and is pretreated before it is released. Approximately 60 gallons per day.

2] TYPES OF ADDITIVES OR PRE-TREATMENT USED IN BOILER BLOWDOWN.

NORMAL SCALING ADDITIVES.